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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Eileen Gonzalez,)	Case No. 1:21-cv-00398-SKO (SS)
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	(Doc. 17)
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from January 14, 2022 to March 15, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this request. Counsel for the Plaintiff is currently in Houston, Texas due

1 to a family emergency involving Counsel's father who is gravely ill with
2 Leukemia. (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is
3 a principal caregiver. Additionally, Counsel has limited access to her computer and
4 will require additional time to brief this matter upon her return to California.

5 Defendant does not oppose the requested extension. Counsel apologizes to
6 the Defendant and Court for any inconvenience this may cause.

7
8 Respectfully submitted,

9 Dated: January 5, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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11 By: /s/ Dolly M. Trompeter
12 DOLLY M. TROMPETER
13 Attorneys for Plaintiff

14
15 Dated: January 5, 2022

16 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration

21 By: */s/ Sarah E. Preston
22 Sarah E. Preston
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*As authorized by email on January 5, 2022)
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ORDER

Based upon the foregoing stipulation of the parties (Doc. 17), and for good cause appearing (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including March 15, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 14) shall be extended accordingly.

IT IS SO ORDERED.

Dated: **January 6, 2022**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE